

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Old LC, Inc. *et al.*,¹

Debtors.

Chapter 11

Case No. 19-11791 (BLS)

Official Committee of Unsecured Creditors
of Old LC, Inc., et al., for and on behalf of
the estates of Old LC, Inc., *et al.*;

Plaintiff,

v.

Upfront V, LP, Breakwater Credit
Opportunities Fund, L.P.; Upfront GP V,
LLC; Mark Suster; Dana Kibler; Gregory
Bettinelli; Saif Mansour; Aamir Amdani;
Eric Beckman; Darrick Geant; and Joseph
Kaczorowski,

Defendants.

Adv. No. 20-51002 (BLS)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Morgan, Lewis & Bockius LLP hereby appears on behalf of Breakwater Credit Opportunities Fund, L.P., Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski (the “**Breakwater Defendants**”) in the above-captioned case, and, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, hereby requests that all notices given or required in these cases, and all documents, and all other papers served in these cases, be given to and served upon:

Jody C. Barillare
1201 N. Market Street, Suite 2201
Wilmington, Delaware 19801
Telephone: (302) 574-7294

¹ The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors’ noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14th Floor, Atlanta, Georgia 30309.

Email: jody.barillare@morganlewis.com

Sabin Willett
MORGAN, LEWIS & BOCKIUS LLP
Sabin Willett
One Federal Street
Boston, MA 02110-1726
Tel: (617) 951-8775
sabin.willett@morganlewis.com

and

Shannon B. Wolf
MORGAN, LEWIS & BOCKIUS LLP
One State Street
Hartford, CT 06103-3178
Tel. (860) 240-2700
shannon.wolf@morganlewis.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the rule specified above but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery telephone, electronically or otherwise, which affects the Debtors or the property of the Debtors.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core matters entered only after de novo review by a district judge, (2) to trial by jury in any proceeding so triable in these cases or in any case, controversy or proceeding related to this case, (3) to have the district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, defenses, setoffs, or recoupments to which the Breakwater Defendants, in any capacity, are or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: November 23, 2020

MORGAN, LEWIS & BOCKIUS LLP
Attorneys for Defendants Breakwater
Credit Opportunities Fund, L.P., Saif
Mansour, Aamir Amdani, Eric Beckman,
Darrick Geant, and Joseph Kaczorowski

By: /s/ Jody C. Barillare
Jody C. Barillare (#5107)
1201 N. Market Street, Suite 2201
Wilmington, Delaware 19801
Telephone: (302) 574-7294
Email: jody.barillare@morganlewis.com

Sabin Willett (*pro hac vice pending*)
One Federal Street
Boston, MA 02110-1726
Tel: (617) 951-8775
sabin.willett@morganlewis.com

Shannon B. Wolf (*pro hac vice pending*)
One State Street
Hartford, CT 06103-3178
Tel. (860) 240-2700
shannon.wolf@morganlewis.com